

REMARKS

As requested in paragraph 1 of the Office Action, the specification paragraph 18 has been amended to make it consistent with the initially filed claims to recite that the use of adhesives or mechanical fasteners is also eliminated by the method.

The Examiner is correct regarding claim 8 as stated in paragraph 2 of the Office Action and that claim is canceled and the dependency of claim 9 is changed from claim 8 to claim 2.

The section 112 rejections have been fully addressed by amending claims 5 and 9 that had previously created the ambiguity. It is the securing step that is done by expansion that is further limited by claims 5 or 9 to accomplish that very step without welding, adhesives or mechanical fasteners, as is now spelled out as well in the specification paragraph 18. The Section 112 rejections in paragraphs 3-6 of the office action are now fully addressed.

While the Office Action claims there is a new ground of rejection making previous arguments offered by Applicants moot, this is clearly not the case as the very same Echols reference USP 6,941,652 was used to reject claim 1 in the Office Action of 5/18/06 paragraph 4 is verbatim repeated as the sole reason to reject claim 1 under Section 102(e). The Examiner offers no insight as to why the arguments previously presented on this reference are not persuasive. It is clear that claim 1 is a method of manufacturing a filter rather than a method of using a fully assembled filter. The Echols reference uses no expansion in the assembly of the base pipe to the filter media. Rather it uses welds 58. Echols runs the assembled filter in the hole and expands it, but the method of claim 1 is about assembly of a filter before it is used. The fact that Echols expands from the base pipe after welding the filter together before run in does not make it an anticipatory reference. Applicants are forced to simply repeat the arguments previously submitted as to this reference in the hope that the Examiner will reconsider. At minimum, it is requested that the amendment be entered as it puts the case in better condition for appeal by eliminating all the formal issues leaving for appeal the sole issue of whether claim 1 is anticipated by Echols. Preferably, Applicants request allowance of all the claims.

The argument from the last amendment about Echols follows:

The application of Echols USP 6,941,652 is traversed. This reference welds the filter 40 to the shroud 42 and then rolls that assembly into a cylinder and seam welds that assembly (column 6 lines 27-32). After that the base pipe 38 is inserted in the welded assembly of the filter and shroud and annular welds 58 hold the screen and shroud to the base pipe. While Echols' assembly is expanded downhole from the base pipe, the filter is already attached to the base pipe when expansion happens. The method of claim 1 is to use expansion to secure the filter to the base pipe. In Echols, the filter is already secured by welding before any expansion happens. Echols doesn't anticipate claim 1.

Respectfully submitted,

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Richard T. Redano
Reg. No. 32,292
Duane Morris LLP
3200 Southwest Freeway
Suite 3150
Houston, TX 77027
Tel.: 713.402.3900
Fax: 713.402.3901

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